

Section A. Verification Procedures for Factors of Eligibility								
Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	NO	YES	Both are above, at or below the applicable income standard. Percent Threshold	10% but see comments	NO	YES	Attestation is considered reasonably compatible unless: 1) the data sources indicate that the applicant’s income is above the applicable Medicaid eligibility threshold; 2) the applicant attests to income that is below the eligibility threshold; and 3) the difference between the income shown by the data sources and the income attested to by the applicant is greater than 10 percent. If individual attests to income above the applicable Medicaid eligibility threshold, attestation is accepted regardless of what electronic data sources show, and individual is screened for eligibility for other insurance affordability programs. Electronic data sources will be used to verify income. Paper documentation will only be requested as a last resort. In cases where the applicant attests to no income and no electronic income information is available, their attestation is accepted without further verification. The requirement for paper documentation may also be waived in exceptional circumstances, as determined on a case-by-case basis. These circumstances include: homelessness; domestic violence; employers closing or moving to another state or country; and employers who refuse to release information. See additional comments
Residency	NO	NO	YES	For individuals 19 and over, information is considered reasonably compatible when both the attestation and the data match shows that the applicant lives in the District, even if the District addresses are different. Information is not reasonably compatible with electronic sources if: 1) no electronic sources show that the applicant is living in the District; or 2) an electronic source indicates that the individual is not living in the District.	N/A	NO	YES	Attestation will be accepted for children under 19 unless an electronic data match indicates that they are not living in the District. For individuals over 19, if they attest to living in DC but this cannot be confirmed by electronic data matching, their attestation is deemed not reasonably compatible and the state will use paper documentation. Self-attestation without additional verification will also be accepted for applicants claiming homeless status. See additional comments
Age (Date of Birth)	YES	NO	NO	N/A	N/A	NO	NO	Attestation of date of birth is accepted without verification. However, if any inconsistency is noted between an individual's attestation and available electronic data sources, paper documentation will be required.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	
Household Composition	YES	NO	NO	An attestation shall be considered reasonably compatible unless two tax filers attest that they will claim the same individual as a tax dependent, or two non-filers in different households claim that the same person is living with them.	N/A	NO	NO	Self-attestation will be accepted without electronic verification unless two tax filers attest that they will claim the same person as a tax dependent or two non-filers in different households attest that the same person is living with them on two separate applications. In such cases, we will require physical documentation. Attestation of pregnancy and multiple gestation (e.g., twins or triplets) will be accepted.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	
Medicare	NO	YES	YES	N/A	N/A	NO	YES	Everyone goes through BENDEX file for post-eligibility. If an inconsistency is identified, then we will request paper documentation. This information should be available through the HUB also.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								
Incarceration	YES	NO	NO	N/A	N/A	NO	NO	Will not preclude eligibility based on incarceration status, as it is not a factor of eligibility for Medicaid. We will use this information for claims purposes. Information for these purposes come from our existing data agreement with SSA and not through the Hub .

* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.

If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).

** States must follow statute, regulations, and guidance for verification of SSN, citizenship and immigration status including obtaining such information through the federal data services hub if available.

*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both) Medicaid & CHIP

State: District of Columbia

Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N) ¹	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
1. Internal Revenue Service (IRS)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Will use IRS data to determine if applicant falls under Medicaid or APTC/CSR income range
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Will use to determine Title 2 income during initial enrollment and during annual recertification to identify inconsistencies and changes in circumstances.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		
6. State General Assistance Programs	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Not used for MAGI calculations. Will use raw data for comparisons
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Not used for MAGI calculations. Will use raw data for comparisons

Electronic Data Source	Determined Useful (Y/N) ¹	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Not used for MAGI calculations because it will not contain reliable income data for most applicants
10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Not used for MAGI calculations because no data match is available
11. Commercial database: (Please describe any commercial databases in the space below)												
The Work Number	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Plan to use on day 1 through the Hub.
12. Other: (Please describe any additional electronic data sources in the space below)												
PARIS	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES	Other (specify in comments)	Used 2 times a year. Shows individuals receiving military or other federal employee pay while also receiving public assistance benefits. This is used to determine whether these individuals are over-income for the benefits they are receiving,

1. The state marked any criterion YES if they were considered in determining the usefulness of the electronic data source; however, the determination of whether the data source was useful/not useful did not rest solely on these criteria.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN (Insert Medicaid, CHIP, or Both) Medicaid & CHIP State: District of Columbia Section B2. Use of Electronic Data Sources Non-Financial:																	
Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	YES	YES	Annually	Used post-enrollment and at renewal for Medicare. Can be used as a verification source of Age/DOB, if necessary.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		This information will be used to create a tickler table that will create a notification when a person's 5-year bar expires.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		DC DMV will only provide data on whether an individual is a District resident, both at initial application and renewal
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		Used to verify District residency at initial application and renewal. See additional comments tab. Data will be provided through the ACEDS system.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		Used to verify District residency at initial application and renewal. See additional comments tab. Data will be provided through the ACEDS system.

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
8. State General Assistance Programs	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		Used to verify District residency at initial application and renewal. See additional comments tab. Data will be provided through the ACEDS system.
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	Used 2 times a year. Will also use to determine if individual has Medicaid in another state, or application for other benefits, if a discrepancy were to be identified.

* Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information.
If used for other purposes, please indicate in Section D.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Medicaid & CHIP

District of Columbia

Section C . Additional Factors of Eligibility for Separate CHIP

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
1. Applicant does not have other coverage	YES	NO	NO	NO	Must be Applied	Self-attestation accepted without additional verification
2. Applicant does not have access to affordable ESI					N/A	
3. When child has had coverage (as applicable to states' waiting period)					N/A	
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1 (describe):					N/A	
5b. Waiting period exception #2 (describe):					N/A	
5c. Waiting period exception #3 (describe):					N/A	
5d. Waiting period exception #4 (describe):					N/A	
5e. Waiting period exception #5 (describe):					N/A	
5f. Waiting period exception #6 (describe):					N/A	
5g. Waiting period exception #7 (describe):					N/A	

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
5h. Waiting period exception #8 (describe):					N/A	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (describe):					N/A	
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						

Section D. Additional Verification Questions		
	Question	Response
1	If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):	<p>The state uses many electronic data sources to verify information and only requests paper documentaiton if information is not available electronically or is not reasonably compatible with the attestation.</p> <p>Exceptional Circumstances for all factors of eligibility – The District will accept self-attestation without paper documentation in exceptional circumstances, including homelessness and in cases of domestic violence.</p> <p>Vital Statistics will not be used to verify citizenship because it was determined that the data contained therein would be unlikely to contain information more recent or reliable than that received through the federal data hub. Therefore, no connection has been established with Vital Statistics.</p>
2	Please describe how the state uses PARIS?	<p>The District receives PARIS data twice a year, in August and February. PARIS data will only be used for post-enrollment verification because the information is not received on a real-time basis.</p> <p>The PARIS match consists of the interstate match, Veterans Administration match and the federal match, which includes information from the Office of Personnel Management (OPM). The interstate match is used to determine if a person is receiving duplicate benefits in participating states. The veterans’ match determines if a person is receiving benefits from the Veteran Administration while receiving public assistance. The federal match shows individuals receiving military or other federal employee pay while also receiving public assistance benefits. This is used to determine whether these individuals are over-income for the benefits they are receiving, and it will be used to re-determine Insurance Affordability Program benefits.</p>
3	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to solely use alternative data sources for financial verification other than those listed in 42 CFR 435.948 (Numbers 1-8 in Section B-1).	NO

	Question	Response
	If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements: 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs.	
4	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to use a mechanism other than the federal data services hub for information that is available through the hub.	NO
	If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements: 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs.	

	Question	Response
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	<p>a. Incarceration</p> <p>The District will receive data from the Social Security Administration’s Prisoner Update Processing System (PUPS), which is included in the federal data services hub. However, the District will accept an applicant’s attestation that he or she is not incarcerated even if the PUPS information indicates that the applicant is incarcerated. The District chose this course of action after evaluating the reliability and accuracy of the PUPS data. The District currently receives PUPS data monthly, and that information typically contains thousands of names of individuals who are no longer incarcerated. The District does not have the staff capacity to follow up on all of these records. Therefore, the District will accept attestation on incarceration regardless of the PUPS data.</p> <p>b. Local Data Hub</p> <p>The District established a local data hub to verify eligibility factors for Medicaid and its state-based Exchange. The local data hub contains data from: the Department of Employment Services; Child and Family Services Agency; the Automated Client Eligibility Determination System; and the Department of Motor Vehicles for the District of Columbia.</p>

<div>Section A. Additional Comments</div> <div><p>Income: Paper documentation will only be required when the available income information is not reasonably compatible with the applicant’s attestation. The District recognizes that an individual’s income may have changed, and that the change may not be reflected in the available electronic data. Due to system defects, the District was unable to verify income and could not process cases with outstanding income verifications, which created a backlog of applications. Beginning in December 2013, in order to address the backlog issue and prevent the delay of Medicaid coverage for thousands of beneficiaries, the District processed the applications based on attested information and conducted post-enrollment verification. The backlog has been resolved; therefore, beginning March 1, 2014, DHCF will require verification of income pre-enrollment for all individuals as stated in the verification plan. Effective March 1, 2014, the District will no longer enroll individuals based on self-attestation and conduct post-enrollment verification of income . The District recieved a waiver from CMS under section 1902(e)(14) of the Act to allow that for applications submitted between November October 1, 2013 and February 28, 2014, the District will enroll based on self-attestation, conduct post-enrollment verification and resolve inconsistencies within 90-120 days while providing benefits.</p><p>Residency: Once a data source shows that the individual is living in the District, the residency information will be considered reasonably compatible. Once a data source indicates that the individual is not living in the District, paper documentation will be required. Paper documentation will also be required when no source indicates that the individual is living in the District. Note that the District will not use any further data sources after finding one that is reasonably compatible with residency in the District, so not all of these sources will be checked for each case. Acceptable documentation, when necessary, includes: a copy of an active lease agreement , certifiied deed, or mortgage statement with D.C address in their name, a phone or utility bill from within the past two months, a signed statement with contact information from another District resident stating that the applicant lives at their address in the District, D.C. Voter Registration Card, Non-expired District of Columbia Motor Vehicle Registration or DC DMV Identification Card, Cancelled checked or receipts for mortgage or rental payments within the past 2 months, Utility bills and payment receipts with D.C. address within the past 2 months, Non-expired Automobile insurance statement with D.C. residency address. Exceptional Circumstances – the District will accept self-attestation of residency without paper documentation in exceptional circumstances, including homelessness and in cases of domestic violence.</p><p>Due to system defects, the District was unable to verify resiency and could not process cases with outstanding residency verifications, which created a backlog of applications. Beginning in December 2013, in order to address the backlog issue and prevent the delay of Medicaid coverage for thousands of beneficiaries, the District processed the applications based on attested information and conducted post-enrollment verification. The backlog has been resolved; therefore, beginning March 1, 2014, DHCF will require verification of residency pre-enrollement for all individuals as stated in the verification plan. Effective March 1, 2014, the District will no longer enroll individuals based on self-attestation and conduct post-enrollment verification of residency . The District recieved a waiver from CMS under section 1902(e)(14) of the Act to allow that for applications submitted between November October 1, 2013 and February 28, 2014, the District will enroll based on self-attestation, conduct post-enrollment verification and resolve inconsistencies within 90-120 days while providing benefits.</p><p>Citizenship and Immigration Status:Verification by way of either electronic or paper documentation is always required for citizenship and immigration status.</p><p>Household Composition: Absent any inconsistency, attestation of household composition will be accepted without further verification. Paper documentation will only be required for household composition when information is not reasonably compatible, meaning that: 1) two tax filers who are not filing jointly attest that they will claim the same individual as a dependent; or 2) two non-filers who do not live together claim that the same individual lives in their household. The District will not use any electronic data sources to verify household composition.</p><p>When paper documentation is required, it may take many forms depending on the individual and whether there is a conflict with another person’s attestation. Acceptable types of documentation include: school or medical records, child care records, statements from non-relatives, leases, mail to or regarding the child or adult dependent, and religious or recreational activity records. For cases where two tax filers attest that they will claim the same person as a tax dependent, a Form 8332 or Form 2120 that applies to the tax year at issue will be conclusive evidence of who may claim that person.</p><p>Paper documentation will not be required in exceptional circumstances, such as: homelessness, domestic violence, and situations where the noncustodial parent refuses to release the necessary documents. These exceptions will be determined on a case-by-case basis.</p><p>Age: When the individual attests to an age that is inconsistent with the birth date shown by SSA and it would affect eligibility, paper documentation will be required. Acceptable forms of documentation include: birth certificate, driver’s license, other government-issued photo ID containing date of birth, or any combination of official photo and non-photo ID and/or other documentation that identifies the individual and gives their date of birth (e.g. a copy of school or medical records containing date of birth along with a photo ID that connects the individual with those records).</p><p>Medicare: Attestation on Medicare status will be accepted without further verification unless it is inconsistent with the BENDEX file, which will be pinged upon initial application and renewal. If attestation is inconsistent with the BENDEX file, paper documentation will be required unless exceptional circumstances apply.</p></div>

Section B1. Additional Comments
<p>To determine and confirm income, the District will first ping the IRS to determine if the individual is below or above the applicable Medicaid income threshold. If the IRS ping places them below the threshold, they proceed directly to the next step. If the ping places them above the threshold, the individual will be asked to attest to their current monthly income before proceeding.</p> <p>After the IRS ping the system will ping all local and federal data sources as described in Section B1 concurrently and break them down by type of income (e.g. earned income, disability benefits, family assistance, unemployment etc...). The individual will then be asked to confirm or deny the income amounts, using Yes/No questions of the following format: “We determined your income from [work/unemployment benefits] to be [X] dollars. Is this correct?” At the end of these questions, the individual will be asked if they have additional income to report. If they answer yes, or if they answered no to any of the Yes/No income questions, they will be sent to an additional page to report income. They will also be sent to this page if there is no income information on them available from federal or local data sources. The data from the IRS and Social Security Adminsistration is not displayed to applicant.</p> <p>On the income reporting page there will be free numerical fields for users to enter income under different categories alongside the data from the income data pings. Once this page is completed, the system will aggregate the all income data given by the applicant and data pings and present it to the individual as a monthly figure. The individual will then be asked if this is accurate. If yes, their attestation is accepted. If no, the individual will again be asked to attest to their total current monthly income. If the amount attested to is more than the total income amount obtained from data sources, or if it is less by no more than 10%, the attestation is accepted. If not, the individual will be required to provide paper documentation to confirm their income attestation.</p> <p>We are only using IRS data to determine if an individual meets financial eligibility for the Medicaid or QHP pathway.</p>

Section B2. Additional Comments
<p>Residency : Persons 19 and Over - To verify residency, the District will check the following electronic data sources in this order: 1) the Automated Client Eligibility Determination (ACEDS) system; 2) the Department of Employment Services; (quarterly wage and unemployment insurance) 3) the Department of Motor Vehicles.</p> <p>Citizenship and Immigration Status: The District will use the federal data services hub to verify immigration status. For trafficking victims under age 18, the District will use the Office of Refugee Resettlement telephone line. Other applicants whose status cannot be verified through the federal data services hub will be required to submit paper documentation. Acceptable types of documentation for verificaiton of citizenship will follow proposed regulations at 42 C.F.R. §435.407. The District will provide a 90-day period to provide satisfactory documentation for individuals whose citizenship or immigration status cannot be verified. If it is determined that an applicant is making a good faith effort to obtain the necessary documents, the individual may receive additional time. During this period, applicants may receive benefits.</p>

Section C. Additional Comments